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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANT UBER TECHNOLOGIES,
INC.'S AND OTTOMOTTO, LLC'S
SUPPLEMENTAL BRIEF IN OPPOSITION
TO WAYMO'S MOTION IN LIMINE NO.
14**

Judge: Hon. William H. Alsup
Trial Date: December 4, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants
3 Uber Technologies Inc. and Ottomotto LLC (collectively, "Uber") in this matter. I am a member in
4 good standing of the Bar of the District of Columbia. I make this declaration in support of Uber's
5 Supplemental Brief In Opposition to Waymo's Motion *in Limine* No. 14. I make this declaration based
6 on personal knowledge and if called as a witness, I could and would competently testify to the matters
7 set forth herein.

8 2. Attached as **Exhibit 1** is a true and correct copy of an excerpt of the October 2, 2017
9 deposition of Uber employee Angela Padilla.

10 I declare under penalty of perjury under the laws of the United States that the foregoing is true
11 and correct. Executed this 25th day of October, 2017, in Washington, DC.

12
13 /s/ Martha L. Goodman
14 Martha L. Goodman

15
16
17 **ATTESTATION OF E-FILED SIGNATURE**

18 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
19 Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has
20 concurred in this filing.

21
22 /s/ Karen L. Dunn
23 Karen L. Dunn